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September 12, 2018

VIA ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

RE: *In re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
This document relates to: *Betru, et al. v. Islamic Republic of Iran*, 18-cv-8297
(SDNY)

Dear Judge Daniels,

On September 12, 2018, our office filed a Motion for Final Judgments against the Islamic Republic of Iran on behalf of 13 plaintiffs, as listed in Exhibit A attached to the Declaration of James P. Kreindler (the “Kreindler Declaration”) and referred to as the “*Betru/Ashton IX*” claimants. See 03-md-1570 (S.D.N.Y.)(GBD)(SN), Doc. Nos. 4159 (Kreindler Decl.); 4159-1 (Exhibit A to the Kreindler Decl.); 03-cv-6977 Doc Nos. 943 (Kreindler Decl.), 943-1 (Exhibit A to the Kreindler Decl.).

In the Exhibit A, we inadvertently omitted six plaintiffs, all of whom are immediate family members of individuals killed in the September 11, 2001 attacks (while one family member Joyce Lilie, is now deceased, Ms. Lilie survived the September 11th death of her son Steven Furman, and Ms. Lilie’s claim is presented by the person who was named in her will as the executor of her estate, which information we have confirmed); all of whom meet the same criteria as set forth in our motion papers (not having filed suit against the Islamic Republic of Iran); and for all of whom we have verified the family relationship and that all claimants survived the September 11th deaths of their immediate family members, as set forth in the Kreindler declaration.

We have therefore prepared a corrected Exhibit A, and ask that if or when this Court enters an Order on the relief requested in the MDL docket at ECF Doc. No. 4159-2, that the Court rely on the attached Corrected Exhibit A filed with this letter, in lieu of ECF Doc. No. 4159-1.

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September 12, 2018

Page 2

Thank you for your consideration of this matter.

Respectfully,

KREINDLER & KREINDLER LLP

/s/ James P. Kreindler

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Enclosure